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Mr. John Flowers  
U.S. Environmental Protection Agency  
Mail Code 4204 M  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

**RE: Voluntary Water Efficiency Labeling Program**

Dear Mr. Flowers:

On behalf of The Maytag Corporation, I appreciate the opportunity to provide written comments regarding the development of a voluntary water efficiency-labeling program. We applaud the U.S. Environmental Protection Agency (EPA) for holding a hearing earlier this month to address key issues about such a program. Maytag supports the consideration of a program that offers meaningful information to American consumers when purchasing water-using products.

A voluntary water efficiency-labeling program should resemble the federal ENERGY STAR program if not somehow become an offshoot of this highly successful labeling program. ENERGY STAR has strong consumer recognition and value when Americans seek to purchase the most energy efficient products. Manufacturers, retailers and other organizations have invested countless resources into producing and/or marketing competitive ENERGY STAR products that appeal to a wide variety of consumer tastes. A water efficiency-labeling program should offer the same voluntary participation, rigorous performance requirements and strong label promotion.

This program is best administered at the federal level so there is consistency across the 50 states. Too often, states have proven unable to reach agreement in setting standard performance levels, which thereby causes confusion for consumers, retailers and manufacturers. While certain states have more interest in water efficiency than others, a uniform program can meet the needs of all states. Most importantly, a federal program can provide better oversight regarding compliance and ensuring that products don't achieve performance requirements by dubious means that may compromise public health and safety standards. The current federal test protocol already measures water use – producing a Water Consumption Factor (WCF) – and water use data has been collected for several years.

No doubt, a water efficiency label will cost money from the government and the participants. Brands and labels do cost money to become established as credible icons in the consumer's mind. Done well, the best brands and labels create reputations that transcend any marketing efforts. Arguably, money spent on ENERGY STAR has been better spent than mandating super

efficient standards, particularly since consumers can feel empowered to make choices that fit their lifestyles and needs.

Maytag encourages the development of a water efficiency label that can take from the ENERGY STAR success. We would even go so far as to suggest incorporating a water symbol into the ENERGY STAR label for products that have both energy and water attributes. While we recognize there may be some concern with diluting the ENERGY STAR brand name, we have concerns about applying too many labels to products that bombard the consumer with overwhelming information. One label can simplify the messages and impact.

We look forward to continuing the discussion about how to develop an optimal voluntary water efficiency-labeling program. A nationwide program will provide consistency and the potential to reach the greatest number of consumers. Thank you again for the opportunity to provide these comments.

Sincerely,

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